## Case 3:15-cv-02187-SC Document 30 Filed 07/20/15 Page 1 of 4 1 PERKINS COIE LLP BRIAN P. HENNESSY (No. 226721) 2 bhennessy@perkinscoie.com J. PATRÍCK CORRIGAN (No. 240859) 3 pcorrigan@perkinscoie.com 3150 Porter Drive 4 Palo Alto, CA 94304 Telephone: 650.838.4300 5 Facsimile: 650.838.4595 6 Attorneys for Plaintiff Ivy Bridge University, LLC 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 SAN FRANCISCO DIVISION 11 IVY BRIDGE UNIVERSITY, LLC f/k/a 12 Case No. 3:15-cv-02187 SC Ivy Bridge College, LLC, a Delaware 13 corporation, STIPULATION AND [PROPOSED] ORDER TO SET A REVISED BRIEFING 14 Plaintiff, SCHEDULE AND CONTINUE HEARING 15 v. 16 HIGHER LEARNING COMMISSION, an Illinois corporation, and Does 1 through 17 25, inclusive, Defendants. 18 19 20 21 22 23 24 25 26 27

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1	WHEREAS, on May 14, 2015, Ivy Bridge University, LLC's ("Ivy Bridge") filed the
2	Complaint in this action and on May 19, 2015 effected service on defendant Higher Learning
3	Commission ("HLC");
4	WHEREAS, Ivy Bridge agreed to extend HLC's time to answer, move, or otherwise
5	respond to the Complaint to Monday, July 13, 2015;
6	WHEREAS, on July 13, 2015, HLC filed a Motion to Dismiss the Complaint;
7	WHEREAS, Ivy Bridge pursuant to N.D. Cal. Local Rule 7-3(a) would normally have 14
8	days to respond after the Motion to Dismiss is filed;
9	WHEREAS, the hearing on HLC's Motion to Dismiss was set for calendar on August 28,
10	2015;
11	WHEREAS, due to travel schedules and other conflicts the parties have agreed to the
12	below proposed schedule pursuant to N.D. Cal. Local Rule 6-1(a);
13	Now therefore, the parties, through the undersigned counsel, hereby stipulate as follows:
14	(1) Ivy Bridge will respond to HLC's Motion to Dismiss on August 26, 2015.
15	(2) HLC's deadline to reply to Ivy Bridge's response will be extended to September 9,
16	2015.
17	(3) The hearing on HLC's Motion to Dismiss will be continued to September 25, 2015 or
18	as soon thereafter as the matter may be heard.
19	IT IS SO STIPULATED.
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## Case 3:15-cv-02187-SC Document 30 Filed 07/20/15 Page 3 of 4 1 July 17, 2015 PERKINS COIE LLP 2 3 By: /s/ Patrick Corrigan Patrick Corrigan (SBN 240859) 4 pcorrigan@perkinscoie.com 5 Attorneys for Plaintiff Ivy Bridge University, LLC 6 7 July 17, 2015 **ELLIOTT GREENLEAF P.C.** 8 By: /s/ Gregory S. Voshell 9 Gregory S. Voshell (pro hac vice) gsv@elliottgreenleaf.com 10 Attorneys for Defendant 11 Higher Learning Commission 12 13 14 I, Patrick Corrigan, hereby attest, pursuant to N.D. Cal. Local Rule 5-1(i)(3), that the 15 concurrence to the filing of this document has been obtained from each signatory hereto. 16 July 17, 2015 PERKINS COIE LLP 17 18 By: /s/ Patrick Corrigan Patrick Corrigan (SBN 240859) 19 pcorrigan@perkinscoie.com 20 Attorneys for Plaintiff Ivy Bridge University, LLC 21 22 23 24 25 26 27 28

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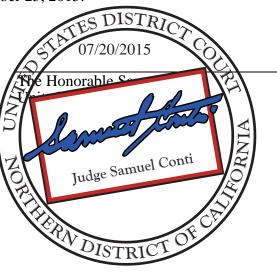
## [PROPOSED] ORDER

PURSUANT TO THE FOREGOING STIPULATION OF THE PARTIES, IT IS SO ORDERED:

(1) Ivy Bridge will respond to defendant HLC's Motion to Dismiss on August 26, 2015.

(2) Defendant's deadline to reply to Ivy Bridge's response is extended to September 9, 2015.

(3) The hearing will be continued to September 25, 2015.



ATTORNEYS AT LAW

PALO ALTO